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Attorneys for Plaintiff /
Counterclaim-Defendant Audrey Davis

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

Audrey Davis,

Plaintiff /
Counterclaim-Defendant,

v.

Rhondie Voorhees,

Defendant /
Counterclaim-Plaintiff,

and,

Embry-Riddle Aeronautical University,

Defendant.

Case No. 3:21-cv-08249-DLR

**STIPULATION FOR DISMISSAL
WITH PREJUDICE OF LESS
THAN ALL PARTIES**

1 Plaintiff Audrey Davis (“Ms. Davis”) and Defendant/Counterclaim Plaintiff
2 Rhondie Voorhees (“Dr. Voorhees”) (collectively, the “Parties”) hereby stipulate as
3 follows:

4 Over the course of the litigation, Ms. Davis discovered that Dr. Voorhees had been
5 put in an untenable position as Dean of Students due to conflicts of interest created by
6 Embry-Riddle Aeronautical University’s (“ERAU”) supervisory structure of Title IX,
7 problems with Title IX at the Prescott Campus, and that Dr. Voorhees had no supervisory
8 role or authority over Title IX at ERAU. Dr. Voorhees wishes to express support for Ms.
9 Davis in her future pursuits and as she continues in this litigation.

10 Accordingly, the Parties no longer wish to pursue any claims against each other. Dr.
11 Voorhees has agreed to dismiss, with prejudice, all claims she has made against Ms. Davis
12 in this lawsuit, including, but not limited to, her Counterclaims for I) Defamation and
13 Defamation Per Se, and II) False Light Invasion of Privacy. Ms. Davis agrees to dismiss,
14 with prejudice, all claims she has made against Dr. Voorhees personally in this lawsuit,
15 including, but not limited to, Count III of her Amended Complaint for Violation of the
16 SCRA. The Parties have further agreed that each party shall bear their own costs and
17 attorneys’ fees.

18 Therefore, the Parties respectfully request that the Court enter the proposed order of
19 dismissal submitted herewith.
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1 Dated: September 12, 2023.

2 Respectfully submitted,

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4 By: /s/ Marc J. Randazza

5 Marc J. Randazza
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17 *Attorneys for Plaintiff/Counterclaim-*
18 *Defendant Audrey Davis*

By: /s/ Daniel R. Warner

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Attorneys for Defendant/
Counterclaim-Plaintiff
Rhondie Voorhees

Case No. 3:21-cv-08249-DLR

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 12th day of September 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy of the foregoing document is being served via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Marc J. Randazza
Randazza Legal Group, PLLC